

EXHIBIT A

August 29 2023 3:27 PM

CONSTANCE R. WHITE
COUNTY CLERK
NO: 23-2-09361-1SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY
CASE COVER SHEET / CIVIL CASECase Title BASSAM ZAAFAN VS. UMPQUA BANK
Atty/Litigant Kaleigh Nicole Boyd
Address 1200 5th Ave Ste 1700
City SEATTLE State WACase Number 23-2-09361-1
Bar# 52684 Phone (206) 340-5991
Zip Code 98101
Email Address _____

Please check one category that best describes this case for indexing purposes.

If you cannot determine the appropriate category, Please describe the cause of action below. This will create a Miscellaneous cause which is not subject to PCLR 3.**APPEAL / REVIEW**☐ Administrative Law Review (ALR 2) REV 6
☐ Civil, Non-Traffic (LCA 2) REV 6
☐ Civil, Traffic (LCI 2) REV 6
☐ Land Use Petition (LUP 2) LUPA**CONTRACT / COMMERCIAL**☐ Breach of Contract, Commercial Non-Contract
or Commercial-Contract (COM 2) STANDARD
☐ Third Party Collection (COL 2) REV 4**JUDGEMENT**☐ Judgement, Another County or Abstract
Only (ABJ 2) Non PCLR
☐ Transcript of Judgement (TRJ 2) Non PCLR
☐ Foreign Judgement Civil or Judgement,
Another State (FJU 2) Non PCLR**TORT / MOTOR VEHICLE**☐ Death, Non-Death Injuries or Property
Damage Only (TMV 2) STANDARD**TORT / NON MOTOR VEHICLE**☐ Other Malpractice (MAL 2) COMPLEX
☐ Personal Injury (PIN 2) STANDARD
☒ Property Damage (PRP 2) STANDARD
☐ Wrongful Death (WDE 2) STANDARD
☐ Other Tort, Products Liability or Asbestos
(TTO 2) COMPLEX**PROPERTY RIGHTS**☐ Condemnation (CON 2) STANDARD
☐ Foreclosure (FOR 2) REV 4
☐ Property Fairness (PFA 2) STANDARD
☐ Quiet Title (QTI 2) STANDARD
☐ Unlawful Detainer / Eviction (UND 2) REV 4
☐ Unlawful Detainer / Contested (UND 2) REV 4**OTHER COMPLAINT OR PETITION**☐ Compel/Confirm Bind Arbitration, Deposit of
Surplus Funds, Interpleader, Subpoenas, Victims'
Employment Leave, or Wireless Number Disclosure,
Miscellaneous (MSC 2) REV 4
☐ Injunction (INJ 2) REV 4
☐ Malicious Harassment (MHA 2) Non PCLR
☐ Meretricious Relationship (MER 2) REV 4
☐ Minor Settlement/No Guardianship (MST2) REV 4
☐ Pet for Civil Commit/Sex Predator (PCC2) REV 4
☐ Property Damage Gangs (PRG 2) REV 4
☐ Relief from Duty to Register (RDR) REV 12
☐ Restoration of Firearm Rights (RFR 2) REV 4
☐ Seizure of Property/Comm. of Crime (SPC2) REV 4
☐ Seizure of Property Result from Crime (SPR2) REV 4
☐ Trust/Estate Dispute Resolution (TDR2) REV 12
☐ Restoration of Opportunity (CRP) REV 4**TORT / MEDICAL MALPRACTICE**☐ Hospital, Medical Doctor, or Other Health Care
Professional (MED2) COMPLEX**WRIT**☐ Habeas Corpus (WHC 2) REV 4
☐ Mandamus (WRM 2) REV 4
☐ Review (WRV 2) REV 4
☐ Miscellaneous Writ (WMW 2) REV 4**MISCELLANEOUS** _____

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY**

August 29 2023 3:27 PM

CONSTANCE R. WHITE
COUNTY CLERK
NO: 23-2-09361-1

BASSAM ZAAFAN

Plaintiff(s)

Vs.

UMPQUA BANK

Defendant(s)

No. 23-2-09361-1

ORDER SETTING CASE SCHEDULE

Type of case:	PRP
Estimated Trial (days):	
Track Assignment:	Standard
Assignment Department:	13
Docket Code:	ORSCS

Confirmation of Service - All Parties Served	9/26/2023
Confirmation of Joinder of Parties, Claims and Defenses	12/26/2023
Jury Demand	1/2/2024
Plaintiff's/Petitioner's Disclosure of Primary Witnesses	2/20/2024
Defendant's/Respondent's Disclosure of Primary Witnesses	3/19/2024
Disclosure of Rebuttal Witnesses	5/7/2024
Deadline for Filing Motion to Adjust Trial Date	6/4/2024
Discovery Cutoff	7/9/2024
Exchange of Witness and Exhibit Lists and Documentary Exhibits	7/23/2024
Deadline to file Certificate or Declaration re: Alternative Dispute Resolution	7/30/2024
Deadline for Hearing Dispositive Pretrial Motions	7/30/2024
Joint Statement of Evidence	7/30/2024
Pretrial Conference	Week of 8/13/2024
Trial	8/27/2024 9:00

NOTICE TO PLAINTIFF/PETITIONER


If the case has been filed, the plaintiff shall serve a copy of the Case Schedule on the defendant(s) with the summons and complaint/petition: Provided that in those cases where service is by publication the plaintiff shall serve the Case Schedule within five (5) court days of service of the defendant's first response/appearance. If the case has not been filed, but an initial pleading is served, the Case Schedule shall be served within five (5) court days of filing. See PCLR 3.

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NOTICE TO ALL PARTIES

All attorneys and parties shall make themselves familiar with the Pierce County Local Rules, particularly those relating to case scheduling. Compliance with the scheduling rules is mandatory and failure to comply shall result in sanctions appropriate to the violation. If a statement of arbitrability is filed, PCLR 3 does not apply while the case is in arbitration.

Dated: August 29, 2023



Judge Matthew Hummel Thomas
Department 13

August 29 2023 3:27 PM

CONSTANCE R. WHITE
COUNTY CLERK
NO: 23-2-09361-1IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTYBASSAM ZAAFAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

UMPQUA BANK,

Defendant.

NO.

SUMMONS

TO: Umpqua Bank
5005 Meadows Rd Ste 400
Lake Oswego, OR, 97035-4291

A lawsuit has been started against you in the above-entitled Court by the above-named Plaintiff. Plaintiff's claims are stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and serve a copy upon the undersigned attorneys for Plaintiff within 60 days after the service of this Summons, excluding the day of service. If you do not respond, a default judgment may be entered against you without notice. A default judgment is one in which Plaintiff is entitled to what it asks for because you have not responded. If you serve a notice of appearance on the undersigned attorneys, you are entitled to notice before a default judgment may be entered.

1 You may demand that Plaintiff file this lawsuit with the Court. If you do so, the
 2 demand must be in writing and must be served upon Plaintiff. Within 14 days after you serve
 3 the demand, Plaintiff must file this lawsuit with the Court, or the service on you of this
 4 Summons and Complaint will be void.

5 If you wish to seek the advice of an attorney in this matter, you should do so promptly
 6 so that your written response, if any, may be served on time.

7 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the
 8 state of Washington.

9 Dated: August 29, 2023

10
 11 **TOUSLEY BRAIN STEPHENS PLLC**

12 By: s/ Kaleigh N. Boyd
 13 Kaleigh N. Boyd, WSBA #52684
 14 1200 Fifth Avenue, Suite 1700
 15 Seattle, WA 98101
 16 Tel: (206) 682-5600/Fax: (206) 682-2992
 17 *kboyd@tousley.com*

18 M. Anderson Berry*
 19 *aberry@justice4you.com*
 20 Gregory Haroutunian*
 21 *gharoutunian@justice4you.com*
 22 Brandon P. Jack*
 23 *bjack@justice4you.com*

24 **CLAYEO C. ARNOLD**
 25 **A PROFESSIONAL CORPORATION**
 26 865 Howe Avenue
 27 Sacramento, CA 95825
 Telephone: (916) 239-4778
 Fax: (916) 924-1829

*Pro Hac Vice Application Forthcoming

Attorneys for Plaintiff and the Class

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SUMMONS - 3

TOUSLEY BRAIN STEPHENS PLLC
1200 Fifth Avenue, Suite 1700
Seattle, Washington 98101
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September 26 2023 12:18 PM

FORM DCONSTANCE R. WHITE
COUNTY CLERK
NO: 23-2-09361-1

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR PIERCE COUNTY

Bassam Zaafer,
Plaintiff
v
Umpqua Bank,
Defendant

CAUSE NO. 23-2-09361-1

CONFIRMATION OF SERVICE
Docket Code: CS, CSSRV

CS



All the named defendants/ petitioners/respondents have been served, have joined or have accepted service in writing. (Check if appropriate; otherwise, check the box below.)

CSSRV



One or more named defendants have not yet been served. (If this box is checked, an additional confirmation of service must be filed pursuant to subsection (b) when service is obtained and the following information provided.)

The following defendants have been served or accepted service: Umpqua Bank

The following defendants have not yet been served: _____

Reasons why service has not been obtained: _____

How service will be obtained: _____

Date by which service is expected to be obtained: _____

No other named defendants remain to be served.

A status conference is requested regarding: _____

Family Law Cases only (PCLR 40(d)): The following petitioner/respondent has been served or accepted service of the Order Setting Case Schedule issued at filing: _____

If Service has not been made, state the reasons why and the date by which service will be accomplished: _____

Date 9.26.23Attorney or Party Kaleigh N. Boyd, Attorney for Plaintiff
WSBA # 52684

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY

BASSAM ZAAFAN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

UMPQUA BANK,

Defendant.

NO. 23-2-09361-1

**PLAINTIFF'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO
DEFENDANT**

Pursuant to Rules 26, 33 and 34 of the Civil Rules for Superior Court in the State of Washington, Plaintiff propounds the following interrogatories and requests for production of documents (collectively these "Discovery Requests") to Defendant and its attorneys of record. These Discovery Requests are intended to draw upon the combined knowledge of Defendant, Defendant's agents and attorneys.

1. Interrogatories.

Pursuant to Civil Rule 33, submit your answers to these interrogatories in writing and under oath to Plaintiff's counsel within forty (40) days from the date of service upon you. If any of these interrogatories cannot be answered in full, then you should answer to the fullest extent possible, specifying the reasons for your inability to answer the remainder and stating

1 whatever information or knowledge you have concerning the unanswered portion or portions.

2 In answering these interrogatories, furnish such information as is available to you, regardless of
3 whether this information is obtained directly by you, through your agents or representatives, or
4 by any of your attorneys.

5 If privilege is claimed as to the information sought in any interrogatory, state the nature
6 of the privilege claimed and identify the dates, locations, documents and parties involved in the
7 communications, activities, or information which is claimed to be privileged.

8 These interrogatories are continuing in nature. Plaintiff, in accordance with Civil Rule
9 26, request supplemental answers to the interrogatories in the event new or additional
10 information becomes known to you.

11 With respect to any interrogatory calling for the identification or listing of documents,
12 unless otherwise indicated herein, you may, in lieu thereof, attach copies of such documents
13 segregated and separated with an identification of the interrogatory or interrogatories to which
14 they are submitted as being responsive. Produce each such document in a manner which
15 preserves its sequential relationship with other documents being produced, including the file
16 folder and folder tabs associated with its file location, and if not apparent on the folder or tabs,
17 accompanied by identification of the person or department from whose files it was taken and
18 such additional source information as is necessary to enable the parties to determine the
19 document's original pre-production location.

20 **2. Requests for Production of Documents.**

21 Pursuant to Civil Rule 34, Plaintiff directs that you produce all of the documents
22 requested herein at the offices of Tousley Brain PLLC, 1200 Fifth Avenue, Suite 1700, Seattle,
23 Washington 98101-4416, within forty (40) days after service of this request, or at such other

time and place as may be mutually agreed upon by the parties. Deliver each document produced in a manner which preserves its sequential relationship with other documents being produced, including the file folder and folder tab associated with its file location, and if not apparent on the folder or tab, accompanied by identification of the person or department from whose files it was taken and such additional source information as is necessary to enable the parties to determine the document's original pre-production location. When documents are produced pursuant to this Discovery Request, the documents are to be produced in a manner so that the Discovery Request to which they are responsive can be readily identified.

These requests for production of documents are continuing in nature. Plaintiff, in accordance with Civil Rule 26, request supplemental responses to these requests in the event new or additional information within their scope becomes known to you.

If any document is withheld under a claim of privilege, please:

(a) Identify such document with sufficient particularity as to author(s), addressee(s), recipient(s), and contents to allow plaintiff to bring the matter before the court;

(b) State the nature of the privilege(s) asserted; and

(c) State in detail the factual basis for the claim of privilege.

Unless otherwise specified, the time period for these requests is January 1, 2021 to the present.

3. **Definitions.**

Throughout these Interrogatories, including the definition of terms, the singular number includes the plural and the plural number includes the singular; the conjunctive (terms connected by "and") includes the disjunctive (terms connected by "or") and the disjunctive includes the conjunctive; words used in the masculine gender include the feminine and words used in the

1 feminine gender include the masculine; the present tense includes the past tense and the past
2 tense includes the present tense, unless the clear meaning indicates otherwise. Wherever the word
3 “including” appears, the meaning intended is “including, but not limited to.”

4 As used throughout these Interrogatories, the following terms have the following
5 meanings:

6 1. As used here, “Plaintiff” means any named plaintiff in this action.

7 2. As used herein, “you,” and “Your,” “Umpqua,” and “Defendant” means Umpqua
8 Bank, its affiliates, and its agents.

9 3. “Lawsuit” means the above-captioned lawsuit.

10 4. As used herein, the term “Communication” is used in its broadest sense and shall
11 mean the transmission, sending, and/or receipt of information of any kind by and/or through any
12 means, whether face-to-face or otherwise, including, but not limited to, speech, writings,
13 language (machine, foreign, or otherwise), computer electronics of any kind (including e-mail),
14 magnetic tape, video tape, photographs, graphs, symbols, signs, magnetic disks, sound, radio,
15 and/or video signal, telephone, teletype, telecommunication, telegram, facsimile transmission,
16 microfilm, microfiche, and/or photographic film of any type.

17 5. “Data Breach” means the data breach that You announced on or about August 11,
18 2023, which occurred in or around in May 2023.

19 6. “Data Devices” means all electronic devices and storage media, including but not
20 limited to personal computer(s) (desktops, laptops or other computing devices), smartphone(s)
21 or similar equipment or devices, including but not limited to PDAs, digital music players,
22 removable devices such as flash drives or memory cards, CDs, DVDs, floppy disks, or any other
23 equipment capable of storing digital data.

1 7. “Data Security Protocols” means any and all administrative safeguards, physical
2 safeguards, technological safeguards, protocols, procedures, manuals, and implementation
3 specifications related to data security.

4 8. “Guidelines and procedures” mean any plan, instruction, regulation, rule, custom,
5 usage or policy, whether written or oral.

6 9. “Person” means any natural person, business, corporation, firm, public
7 corporation, municipal corporation, state government, local government, agency, partnership or
8 other legal entity.

9 10. “PII” means information that can be used to identify an individual and includes,
10 but is not limited to, names, addresses, dates of birth, identification or account numbers, credit
11 or debit card numbers, Social Security numbers, phone numbers, email addresses, and financial
12 information including but not limited to bank account details.

13 11. “Server” means any general purpose computer that runs software which multiple
14 users can access simultaneously located at or servicing Your facilities.

15 12. As used herein, the term “person” means any natural person and any other
16 cognizable entity, including, but not limited to, corporations, proprietorships, partnerships, joint
17 ventures, unions or guilds, consortiums, clubs, associations, foundations, governmental agencies
18 or instrumentalities, societies, organizations, and orders.

19 13. As used herein with respect to a person, the terms “identify” or “identity” mean
20 to provide, to the extent known, the person’s full name, present or last known address, and when
21 referring to a natural person, the present or last known place of employment. Once a person has
22 been identified in accordance with this paragraph, only the name of that person need be listed in
23 response to subsequent requests to identify that person.

14. As used herein with respect to a meeting, the term “identify” means to provide, to the extent known, the location of the meeting, the persons attending the meeting, the location and date of the meeting, and the subject matter discussed at the meeting.

15. As used herein, the terms “reflect,” “refer,” and “relate to” mean constituting, defining, embodying, evidencing, identifying, stating, supporting, comprising, containing, setting forth, showing, disclosing, describing, explaining, summarizing, mentioning, pertaining to, and concerning.

16. “And” or “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

17. “Any” shall be understood to include and encompass “all.”

INTERROGATORIES

INTERROGATORY NO. 1: Do any insurance or indemnification policies exist that may satisfy part or all of a judgment that may be entered in this action, or to indemnify or reimburse for payments made to satisfy such judgment? If so, please state as to each insurance agreement or policy its complete contents, including:

- (a) Name, address and telephone number of insurer or indemnitor;
- (b) Name, address and telephone number of each named insured or indemnitee;
- (c) Each type of coverage provided;
- (d) Limits of each type of coverage provided;
- (e) Amount of deductible as to each coverage;
- (f) Policy period coverage;

1 (g) Policy number.

2 NOTE: This interrogatory may be responded to by producing a complete copy of the
3 declaration page of each insurance agreement or policy.

4 **ANSWER:**

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7 **INTERROGATORY NO. 2:** Have any of the insurers or indemnitors identified in
8 your response to the preceding interrogatory denied, in whole or in part, coverage or
9 indemnification for any of plaintiff's claims, or accepted defense of this action upon a
10 reservation of rights? If so, please state as to each:

11 (a) Name, address and telephone number of the insurer or indemnitor;

12 (b) Contract language upon which the insurer or indemnitor bases its denial of
13 coverage, indemnification or reservation of rights;

14 (c) Reasons for the insurer or indemnitor's denial of coverage, indemnification or
15 reservation of rights.

16 **ANSWER:**

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18 **REQUESTS FOR PRODUCTION**

19 **REQUEST FOR PRODUCTION NO. 1:** Produce all non-privileged communications
20 with your insurer(s), other self-insured retention groups (including, not limited to any self-
21 insurance liability program and any re-insurance or excess policies) or indemnitor(s), relating
22 to the Data Breach, including but not limited to written and electronic communications, tender
23 letters, declarations pages and certified insurance policies in effect at the time of the alleged

1 Data Breach, reservation of rights letters, coverage determination letters, contracts, invoices,
2 and any other electronically stored information relating to the Data Breach.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 2.** All Documents and Communications
7 referencing the Plaintiff.

8 **RESPONSE:**
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11 **REQUEST FOR PRODUCTION NO. 3.** Documents sufficient to identify: (a) any
12 Person involved in the Data Breach; (b) any Person with responsibility for developing or
13 implementing Your Data Security Protocols; and (c) Persons with authority over Your data
14 security.

15 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 4.** Documents sufficient to identify the job
19 duties of any Person described in Request No. 3.

20 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 5.** Documents sufficient to identify the
2 qualifications, including education, training and experience, of any Person described in Request
3 No. 3 to perform the job duties identified in Request No. 4.

4 **RESPONSE:**
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7 **REQUEST FOR PRODUCTION NO. 6.** All contracts and communications with any
8 Person described in Request No. 3 to perform the job duties identified in Request No. 4.

9 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 7.** All Documents related to the Data Breach,
13 including any internal or external investigations, reports, executive summaries, analyses, or
14 audits.

15 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 8.** All Documents and communications
19 regarding, concerning, or discussing audits, reviews, risk evaluations, penetration tests, or other
20 assessment of Your Data Security Protocols or implementation of those Protocols, including
21 both internal audits and audits conducted by third party vendors.

22 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 9.** All Documents related to changes made to
2 any of Your Data Security Protocols after the Data Breach.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 10.** All Documents discussing Your efforts to
7 notify victims and the general public of the Data Breach.

8 **RESPONSE:**
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11 **REQUEST FOR PRODUCTION NO. 11.** All analyses of Your Data Security
12 Protocols or the implementation of Your Data Security Protocols undertaken by You or any
13 third party.

14 **RESPONSE:**
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17 **REQUEST FOR PRODUCTION NO. 12.** Documents sufficient to identify each
18 individual whose PII was compromised during the Data Breach, including the type of
19 information that was compromised for each individual, and the format in which You stored that
20 PII, and the location where the data was stored.

21 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 13.** Documents sufficient to show Your
2 document retention policies, including document retention or destruction policies with respect
3 to e-mail or other electronically stored or recorded documents.

4 **RESPONSE:**
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7 **REQUEST FOR PRODUCTION NO. 14.** All Documents or Communications related
8 to or evidencing the availability or sale of PII following the Data Breach of any individual
9 whose PII You collected, including but not limited to sales over the Internet, the dark web,
10 underground, or black markets.

11 **RESPONSE:**
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14 **REQUEST FOR PRODUCTION NO. 15.** Documents sufficient to identify the forms
15 of notice You provided to Data Breach victims concerning the Data Breach, the date(s) such
16 notice was given, the manner in which the notice was presented, and the recipients of the
17 notice.

18 **RESPONSE:**
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21 **REQUEST FOR PRODUCTION NO. 16.** All documents related to how You
22 determined which individuals should receive notice of the Data Breach.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 17.** Documents sufficient to identify the date
2 that You first learned of the Data Breach.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 18.** Documents sufficient to identify the date
7 that You first should have been aware of the Data Breach.

8 **RESPONSE:**
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11 **REQUEST FOR PRODUCTION NO. 19.** Documents sufficient to show the nature,
12 scope, and extent of the Data Breach, and when You first learned of the nature, scope, and
13 extent of the Data Breach.

14 **RESPONSE:**
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17 **REQUEST FOR PRODUCTION NO. 20.** Documents sufficient to show when You
18 first should have been aware of the nature, scope, and extent of the Data Breach.

19 **RESPONSE:**
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22 **REQUEST FOR PRODUCTION NO. 21.** All communications between You and any
23 governmental, law enforcement, or regulatory agencies concerning the Data Breach.

1 **RESPONSE:**

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4 **REQUEST FOR PRODUCTION NO. 22.** All communications between You and any
5 individual whose PII was involved in the Data Breach.

6 **RESPONSE:**

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9 **REQUEST FOR PRODUCTION NO. 23.** All Documents and Communications
10 concerning, reflecting, memorializing or discussing Your internal policies, procedures, and
11 protocols for contracting with third-parties who access or are provided any PII that You collect.

12 **RESPONSE:**

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15 **REQUEST FOR PRODUCTION NO. 24.** All Communications about Data Security
16 or PII between You and any IT vendor involved in setting up, maintaining, inspecting,
17 troubleshooting, or auditing IT systems of third parties to whom You provide PII that You
18 collect.

19 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 25.** Documents sufficient to show budget
23 requests, actual budgets and the total expenditures, and allocations to ensure the security of PII

1 that You maintain, including but not limited to Documents sufficient to show the total amount
2 of money spent on IT services for each year from 2020 to the present.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 26.** Documents sufficient to identify any third-
7 party IT consultant, expert, forensic firm, or other entity retained by You to audit, inspect,
8 review, or restructure Your data security before You learned of the Data Breach.

9 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 27.** Documents sufficient to identify any third-
13 party IT consultant, expert, forensic firm, or other entity retained by You to audit, inspect,
14 review, or restructure Your data security after You learned of the Data Breach.

15 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 28.** Documents sufficient to identify any third-
19 party IT consultant, expert, forensic firm, or other entity retained by You to audit, inspect,
20 review, or restructure the data security of any third party to whom You provide or provided PII
21 that You collected.

22 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 29.** All Documents that relate, refer,
2 memorialize, or otherwise pertain to Your policies, procedures, and protocols for monitoring
3 third parties to whom You provide PII that you collect for unauthorized activity, including
4 reviewing records of information system activity, such as audit logs, access reports, and
5 security incident tracking reports.

6 **RESPONSE:**
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9 **REQUEST FOR PRODUCTION NO. 30.** All Documents that relate, refer,
10 memorialize, or otherwise pertain to Your policies, procedures, and protocols aimed at
11 preventing, detecting, containing, or correcting security violations, including policies,
12 procedures, and protocols for passwords, data encryption, network segmentation, logging,
13 remote access by employees, and system integrity and event monitoring.

14 **RESPONSE:**
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17 **REQUEST FOR PRODUCTION NO. 31.** All Documents that relate, refer,
18 memorialize, or otherwise pertain to Your policies, procedures, and protocols regarding
19 retention and deletion of PII by third parties to whom You provide PII that You collect.

20 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 32.** All Documents regarding proposals or
2 recommendations (from both internal and external sources) concerning improvements to Your
3 Data Security Protocols, implementation of Your Data Security Protocols, or the security of
4 Your Networks and the PII contained within them.

5 **RESPONSE:**
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8 **REQUEST FOR PRODUCTION NO. 33.** All Documents regarding Your compliance
9 or noncompliance with any applicable network or data security guidelines or standards, such as
10 NIST, COBIT 5, the HITECH Act, PCI DSS, ISO/IEC27001, and ISO/IEC27002.

11 **RESPONSE:**
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14 **REQUEST FOR PRODUCTION NO. 34.** All Documents that relate, refer,
15 memorialize, or otherwise pertain to Communications regarding the Data Breach issued to the
16 public at large, including Communications between You and any member of the media, and
17 any statements or Communications regarding the Data Breach or prior data breaches.

18 **RESPONSE:**
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21 **REQUEST FOR PRODUCTION NO. 35.** All Documents that discuss the costs You
22 incurred as a result of the Data Breach.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 36.** All Documents that refer, relate to, or
2 identify the individuals who obtained Your customers' PII as part of the Data Breach.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 37.** All Documents that refer, relate to, or
7 identify any market transactions related to or involving PII obtained as part of the Data Breach.

8 **RESPONSE:**
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10 Dated: August 30, 2023

11 TOUSLEY BRAIN STEPHENS PLLC

12 By: s/Kaleigh N. Boyd

13 Kaleigh N. Boyd, WSBA #52684
14 kboyd@tousley.com
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 Seattle, Washington 98101
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16 M. Anderson Berry*
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23 *Pro Hac Vice Application Forthcoming

Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

I declare and state that I am a citizen of the United States and resident of the state of Washington, over the age of 18 years, not a party to the above-entitled action, and am competent to be a witness herein. My business address and telephone number are 1200 Fifth Avenue, Suite 1700, Seattle, Washington 98101, telephone 206.682.5600.

On August 30, 2023 I caused to be served the foregoing document on the office named below via legal service:

Umpqua Bank
5005 Meadows Rd Ste 400
Lake Oswego, OR, 97035-4291

I declare under penalty of perjury under the laws of the state of Washington and the United States that the foregoing is true and correct.

Executed this 30th day of August, 2023, at Seattle, Washington.

s/Linsey M. Teppner
Linsey M. Teppner, Legal Assistant